

Thomas R. Rask, III, OSB No. 934031

trask@kelrun.com

Robert B. Lowry, OSB No. 852751

rlowry@kelrun.com

Kell, Alterman & Runstein, L.L.P.

520 SW Yamhill St., Suite 600

Portland, OR 97204-1329

Telephone: 503/222-3531

Fax: 503/227-2980

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**CONSUMER CELLULAR,
INCORPORATED**, an Oregon corporation,

Plaintiff,

v.

CONSUMERAFFAIRS.COM, INC., a
Nevada corporation; **CONSUMERS
UNIFIED, LLC**, a Nevada limited liability
company; and **DAVID ZACHARY
CARMAN**,

Defendants.

Case No.: 3:15-cv-01908-PK

**PLAINTIFF'S UNOPPOSED
MOTION TO EXTEND
DISCOVERY DEADLINE AND
CORRESPONDING PRETRIAL
DEADLINES**

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7-1, Plaintiff submits this unopposed motion to extend the
discovery deadline and corresponding pretrial deadlines. The undersigned counsel for

Plaintiff certifies that he has conferred with Defendants' counsel, Duane Bosworth, who does not oppose and concurs with this motion, including the reasons and dates stated herein.

MOTION

Plaintiff moves for an extension of all case management deadlines, including the following:

<u>Deadline</u>	<u>Current</u>	<u>Proposed</u>
Discovery	February 8, 2016	June 7, 2016 (120 days)
Dispositive Motions	February 8, 2016	July 22, 2016
Joint ADR Report	March 7, 2016	July 22, 2016
Pretrial Order	March 7, 2016	30 days after ruling on dispositive motions

ARGUMENT

There have previously been no time extensions of case management deadlines in this case. A Rule 16 conference has not been held while a special motion to strike remains pending.

This motion complies with Local Rule 16-3. There is good cause for the deadlines to be modified while the special motion to strike is pending. No trial date has been set.

This motion is made in good faith, not for the purpose of delay, and is supported by the record on file herein and the attached Declaration of Robert B. Lowry.

DATED this 5th day of February, 2016.

s/Robert B. Lowry

THOMAS R. RASK, III

OSB No. 934031

ROBERT B. LOWRY

OSB No. 852751

503/222-3531

Attorneys for Plaintiff